

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE BRASKEM, S.A., SECURITIES
LITIGATION

Civil Action No. 15-CV-5132-PAE

**LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT**

PLEASE TAKE NOTICE that Lead Plaintiff Boilermaker-Blacksmith National Pension Trust ("Lead Plaintiff"), on behalf of themselves and each of the Settlement Class Members, move this Court before the Honorable Paul A. Engelmayer for an order pursuant to Rule 23(e) of the Federal Rules of Civil Procedure to (i) preliminarily approve the Settlement; (ii) preliminarily certify the Settlement Class for the purposes of the Settlement; (iii) approve the proposed form and manner of notice to Settlement Class Members; (iv) approve the proposed Plan of Allocation; (v) preliminarily appoint Lead Plaintiff as class representative for the Settlement Class and Lead Counsel as class counsel for the Settlement Class; and (vi) schedule a hearing on Lead Plaintiff's motion for final approval of the Settlement and Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses.

Dated: September 14, 2017

Respectfully submitted,

/s/ Steven J. Toll

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